

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SRC LABS, LLC & SAINT REGIS
MOHAWK TRIBE,

Plaintiffs,

v.

AMAZON WEB SERVICES, INC.,
AMAZON.COM, INC.,
& VADATA INC.

Defendants.

Case No.: 2:18-cv-00317-JLR

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO MODIFY
CLAIM CONSTRUCTION SCHEDULE**

NOTE ON MOTION CALENDAR:
Thursday, August 30, 2018

JURY TRIAL DEMANDED

Plaintiffs SRC Labs, LLC & Saint Regis Mohawk Tribe (collectively, "Plaintiffs") and Defendants Amazon Web Services, Inc., Amazon.com, Inc. & VADATA Inc. (collectively, "Amazon") submit this stipulation to request the following modifications to the Court's Minute Order Setting Trial Dates and Related Dates entered on May 22, 2018 (Dkt. No. 95) (the "Minute Order").

Event	Current Deadline	Modified Deadline
Reports from expert witnesses regarding Markman issues	9/7/18	9/21/18 9/21/2018
Rebuttal expert reports regarding Markman issues	9/21/18	10/5/18
Joint claim chart and Prehearing Statement	9/28/18	10/24/18
Opening claim construction briefs	10/26/18	11/2/18
Responsive claim constructive briefs	11/9/18	11/16/18
Markman Hearing	12/20/18	12/20/18

Good cause exists for this extension because the parties are currently engaging in ongoing discussions to narrow the number of claim terms in dispute. The proposed modifications do not change the date of the *Markman* hearing and will not require modifying any other deadlines set forth in the Court's Minute Order.

Stipulated and agreed to this 30th day of August 2018.

Dated: August 30, 2018

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VADATA, Inc.

PROPOSED ORDER

This matter is before the Court on the parties' Stipulated Motion to Modify Claim Construction Schedule. The Court, having considered this matter and the record in this case, ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the claim construction deadlines are modified as follows.

Event	Current Deadline	Modified Deadline
Reports from expert witnesses regarding Markman issues	9/7/18	9/21/18 9/21/2018
Rebuttal expert reports regarding Markman issues	9/21/18	10/5/18
Joint claim chart and Prehearing Statement	9/28/18	10/24/18
Opening claim construction briefs	10/26/18	11/2/18
Responsive claim constructive briefs	11/9/18	11/16/18
Markman Hearing	12/20/18	12/20/18

SO ORDERED this 31st day of August, 2018


 THE HONORABLE JAMES L. ROBERT
 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Jessica M. Kaempf, hereby certify that on August 30, 2018, I caused the foregoing
STIPULATED MOTION AND [PROPOSED] ORDER FOR MODIFICATION OF THE
CLAIM CONSTRUCTION SCHEDULE to be served on the following parties as indicated
 below:

<p>Carmen E. Bremer Bremer Law Group PLLC 1700 Seventh Avenue, Suite 2100 Seattle, WA 98101</p> <p><i>Counsel for Plaintiffs</i> SRC LABS, LLC AND SAINT REGIS MOHAWK TRIBE</p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email Carmen.bremer@bremerlawgroup.com</p>
<p>Michael W. Shore Alfonso G. Chan Christopher L. Evans Andrew M. Howard Shore Chan DePumpo LLP 901 Main Street, Suite 3300 Dallas, TX 75202</p> <p><i>Counsel for Plaintiffs</i> SRC LABS, LLC AND SAINT REGIS MOHAWK TRIBE</p>	<p><input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email mshore@shorechan.com achan@shorechan.com cevans@shorechan.com ahoward@shorechan.com</p>

Dated: August 30, 2018

By: s/ Jessica M. Kaempf
 For Jessica M. Kaempf, WSBA No. 51666
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